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Group - Washington

May 28, 1993

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

**EX PARTE**

Donna R. Searcy  
Secretary  
Federal Communications Commission  
Mail Stop 1170  
1919 M Street, N.W., Room 222  
Washington, D.C. 20554

Dear Ms Searcy:

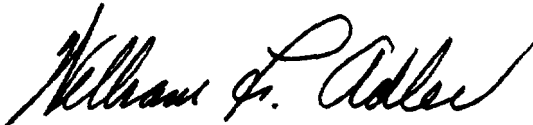
Re: CC Docket No. 92-237

On behalf of Pacific Bell, please find enclosed an original and two copies of its written ex parte presentation concerning the above-referenced proceeding. Please associate this material with this proceeding.

Two copies of this notice were submitted to the Secretary of the FCC in accordance with Section 1.1206(a)(1) of the Commission's Rules.

Please stamp and return the provided copy to confirm your receipt. Please contact me should you have any questions or require additional information concerning this matter.

Sincerely,



Attachment

cc: Peyton Wynns, Chief - Industry Analysis Division

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List A B C D E

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Nancy C. Woolf  
Attorney

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May 27, 1993

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Ms. Donna R. Searcy  
Secretary  
Federal Communications Commission  
1919 M. Street, N.W., Room 222  
Washington, D.C. 20554

Re: CC Docket No. 92-237

Dear Ms. Searcy:

This letter responds to the May 6, 1993 letter filed on behalf of Ad Hoc Telecommunications Users Committee and others relating to Ad Hoc's proposal for a nationwide uniform dialing plan. Pacific Bell wants to take this opportunity to highlight some of our very real concerns raised by such a proposal.

The Ad Hoc proposal would require all residence and business customers to dial the prefix "1" and the area code (NPA) before a toll call, and never dial a "1" for local calls (even if the called number is in a foreign NPA). Ad Hoc acknowledges that for this to work, no central office (CO) codes may be assigned that are the same as the home area code or adjacent area codes. Ad Hoc states that only 6 CO codes are currently in use that would need to be changed to carry out this proposal.

While this may be true today, after 1995, with the implementation of interchangeable NPAs, NPAs and CO codes will look the same (i.e., NXX). Thus, when a new NPA is assigned, it is likely that the same sequence of numbers will already be in use as a CO code within or adjacent to the new NPA. Ad Hoc's proposal would require telephone number changes of everyone with that CO code, or this scheme would severely restrict the assignment of new NPAs. It would make number administration incredibly complex, would be extremely burdensome for customers and add to the already high cost of an area code split.

Apart from the concern about future area code assignment, the Ad Hoc proposal would be extremely confusing to most customers, at least in California. Customers would need to know whether they were making a call in the free local area or a toll call. In California, local calling is limited to 12 miles from the originating location. After 12 miles, toll charges apply. Thus, customers would need to know whether the call is a toll call, and then whether they should be dialing on a 7 digit

basis (if local and within the area code), 10 digit basis (if local, but out of area code), or 11 digit basis (if it's a toll call). This is contrary to how most Californians have been dialing their calls for many years, and is contrary to the agreed upon future direction for the California Statewide Uniform Dialing Plan.

Since the early 1970s, many areas of California have been using 7 digit dialing for calls within the home area code, and 11 digit dialing to foreign NPAs, regardless of whether a call is toll or local. The North American Numbering Plan supports this approach as a standard and Pacific is implementing it statewide. Currently, of the 13 area codes we administer in California, 8 now use this form of dialing. This represents about 11 million of our 14 million customers. In 3 area codes, the prefix "1" is still used for calls outside the local calling area, and the remaining 2 area codes use a combination of both dialing plans. In these 5 area codes, we are in the process of changing the dialing plans to conform to the standard. This has already been announced to customers in the 5 NPAs.

Not only is Pacific standardizing its dialing plan for its customers to a single statewide dialing plan, most other California local exchange carriers are carrying out similar upgrades in their networks. Pacific has worked closely with these 20 other LECs, and the California Public Utilities Commission, to institute the Statewide Uniform Dialing plan that is underway. We have already sent letters to PBX vendors and customers, alarm companies, COPT vendors and customers, deaf and disabled customers, IECs, Paging and Cellular companies, and are in the process of notifying our residence and business customers of the dialing plan changes. This notification effort, which includes every customer, is expected to cost over \$2.5 million. The implementation date is October 11, 1993.

On a technical basis, the Ad Hoc proposal will entail great cost to the LECs. Every LEC switch in the network would need to be revised to recognize this different dialing pattern. Every class of service and screening table within the LEC switch would need to be examined and modified. We would then need to perform AMA testing on every class of service in each switch in order to assure the changes made were adequate. And, the changes necessary to accomplish this dialing pattern would increase the interdigital timing of the switch, decreasing overall switch capacity.

The Ad Hoc proposal would also require great costs to change customer dialing instructions. These costs include notifying all customers as to a new dialing system, as well as changing coin phone instruction cards, LEC directory pages, calling cards, and requiring business customers (such as hospitals and

hotels) to reissue their printed materials for customer dialing instructions.

The Commission should see this request by Ad Hoc for what it is -- an attempt by a special interest group of PBX vendors (and their users) to escape their responsibilities to keep CPE up to date for network changes and new code openings. Certainly, it would be easier for the PBX vendors to program toll restrictions into the machine if all toll calls began with the prefix "1." However, changing the dialing plan for millions of customers in order to minimize the expense for certain CPE vendors and businesses is not equitable. Also, Commission Rules require CPE vendors or their agents to maintain and repair equipment (section 68.216 of the Commission's Rules.) Telephone companies should not have to subsidize this service. Furthermore, all telephone company customers should not have to bear the burden of this proposed change so that costs are reduced in the PBX market.

For all of these reasons, the Commission should not require the nationwide dialing plan proposed by Ad Hoc. Dialing issues are usually local in nature and are handled by state public utility commissions. Absent full and fair participation in a proceeding by all affected parties, no decision regarding this proposal should be made. As Pacific has illustrated, for California, this proposal would be horrendous, requiring expenditure of millions of dollars, and resulting in massive customer confusion. It also represents a giant step backward in California's implementation of Statewide Uniform Dialing and ease of dialing for all California telephone subscribers.

Sincerely,



Nancy C. Woolf  
Attorney

Enclosure

cc: James S. Blaszek (Ad Hoc Telecommunications Users Committee);  
Ellen G. Block (California Bankers Clearing House Association, et. al.);  
Bradley Stillman (Consumer Federation of America);  
William G. Irving (County of Los Angeles);  
Joseph P. Markoski (Information Technology Association of America);  
Brian R. Moir (International Communications Association);  
Richard M. Kessel (New York Consumer Protection Board);  
R. Michael Senkowski (Tele-Communications Association);  
Docket No. 92-237 Service List (enclosed)

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